

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

IN RE:

WILLIAM JAMES, JR.
ESSIE CLARK JAMES
Debtors

Case No: 11-25670-D
Chapter: 13

MOTION TO ADVANCE MORTGAGE

COME NOW the Debtors, by and through their attorney and moves this Honorable Court to advance their ongoing mortgage payments to resume October 2013. In support of this Motion the Debtor would respectfully state unto this Honorable court as follows:

1. That the instant case was filed June 6, 2011 and confirmed by this Court on August 12, 2011.
2. That during the months of July, August and September 2013, the enrollment in their daycare center declined to the point where they were unable to make plan payments.
3. That debtors will resume full plan payments October 1, 2013.

WHEREFORE PREMISES CONSIDERED, DEBTOR PRAYS:

1. That the ongoing mortgage payments be advanced to resume October 8, 2013;
2. That the mortgage creditor Acqura Loan Services be allowed to file an amended proof of claim for the increased arrearage;
3. That the Chapter 13 Trustee modify plan payments accordingly;
4. For such further relief as this Court deems appropriate.

Respectfully Submitted,

/s/Janet M. Lane
Janet M. Lane #014634
119 Racine, Ste. 200-C
Memphis, TN 38111
(901) 219-810

CERTIFICATE OF SERVICE

This is to certify that on this day, September 17, 2013, I have served a copy of this pleading by U.S. Mail and/or electronically upon:

/s/Janet M. Lane

Debtor

Debtor's Attorney

Acura Loan Services

P.O. Box 20273

Dallas, TX 75320-2743

George W. Stevenson, Chapter 13 Trustee